

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 03-12438-JGD
)	
88 LOVELLS LANE, MARSTONS)	
MILLS, MASSACHUSETTS,)	
)	
Defendant.)	
)	

UNITED STATES' MOTION FOR RELEASE OF *LIS PENDENS*

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves that this Court authorize the United States to release the *Lis Pendens* recorded at the Barnstable County Registry of Deeds against the real property located at 88 Lovells Lane, Marstons Mills, Massachusetts (the “Defendant Property”).

As grounds for this motion, the United States submits that Claimant Victor Miller (“Miller”) and the United States have entered into a Settlement Agreement whereby Miller has agreed to forfeit to the United States a sum of One Hundred Two Thousand Five Hundred Dollars \$102,500.00 in United States currency in lieu of the Defendant Property.

WHEREFORE, the United States requests that the Court authorize the *Lis Pendens* to be released. For the Court's convenience, a proposed Release of *Lis Pendens* is submitted along with this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Jennifer A. Serafyn
Jennifer A. Serafyn
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Dated: June 23, 2008

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I conferred with Claimant's counsel, Steven T. Snow, Esq., who assented to the filing of this motion.

/s/ Jennifer A. Serafyn
Jennifer A. Serafyn
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on June 23, 2008.

/s/ Jennifer A. Serafyn
Jennifer A. Serafyn
Assistant U.S. Attorney